

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
V.	)	Crim. No. 15-cr-10271-WGY
	)	
ALEX LEVIN	)	
_____	)	

**DEFENDANT'S ASSENTED-TO MOTION FOR PERMISSION TO TRAVEL**

The defendant, Alex Levin, moves that this Court permit him to travel to Vermont from January 23, 2019 to January 28, 2019. Mr. Levin's pretrial conditions of release restrict his ability to travel beyond Massachusetts, New Hampshire, Rhode Island, Connecticut, and New York without Court permission. The United States, through Assistant U.S. Attorney Anne Paruti, assents to this motion. Jessica Turkington, Mr. Levin's assigned probation officer, has also indicated that she has no objection to this motion.

On July 6, 2018, the Court granted a motion to modify Mr. Levin's conditions of release and allow him to travel to the states bordering Massachusetts. Counsel mistakenly neglected to specifically include Vermont in this request. Additionally, the Court removed a previously imposed curfew in order to allow Mr. Levin greater flexibility with this work schedule. Mr. Levin is still required to notify and seek approval from Probation and Pretrial Services in advance of any travel plans. Mr. Levin's probation officer, Ms. Turkington, informed him that the Court would have to approve any travel to the state of Vermont.

Mr. Levin hopes to travel to Vermont to spend time with his fiancé. They plan to stay in Quechee, Vermont and ski in Killington, Vermont while there. Mr. Levin's fiancé's friend has offered to let them use her house in Quechee while they are in Vermont.

Mr. Levin has abided by the Court's conditions of release at all times. He has an unblemished record of compliance while on release. Mr. Levin has steadfastly adhered to the travel conditions imposed upon him, and has conferred with his probation officer on each occasion that he has sought permission to leave Massachusetts. Mr. Levin's adherence to the Court's orders during his release indicates that allowing him to travel to Vermont for a brief period is warranted.

WHEREFORE, the defendant moves that this Court allow this motion and allow him to travel to Vermont from January 23, 2019 to January 28, 2019.

ALEX LEVIN  
By his attorneys,  
CARNEY & ASSOCIATES

*J. W. Carney, Jr.*

J. W. Carney, Jr.  
B.B.O. # 074760

*Daniel J. Gaudet*

Daniel J. Gaudet  
B.B.O. # 688120

20 Park Plaza, Suite 1405  
Boston, MA 02116  
617-933-0350  
JCarney@CARNEYdefense.com

January 15, 2019

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DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

ALEX LEVIN

Crim. No. 15-cr-10271-WGY

**AFFIDAVIT IN SUPPORT OF DEFENDANT’S MOTION**  
**FOR PERMISSION TO TRAVEL**

I, Daniel J. Gaudet, state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

Daniel J. Gandet

Daniel J. Gaudet

January 15, 2019

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

*Daniel J. Gaudet*

Daniel J. Gaudet